

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
PES HOLDINGS, LLC, <i>et al.</i> , ¹)	
)	Case No. 19-11626 (LSS)
Debtors.)	
)	(Jointly Administered)
)	
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)	
PES HOLDINGS, LLC, <i>et al.</i> ,)	
)	Adversary Proceeding
Plaintiffs,)	
)	Case No. 20-50454 (MFW)
-and-)	
)	
ICBC STANDARD BANK PLC,)	
)	
Intervenor-Plaintiff,)	
)	
v.)	
)	
ALLIANZ GLOBAL RISKS US INSURANCE)	
CO., <i>et al.</i> ,)	
)	
Defendants.)	
)	

**JOINT NOTICE OF COMPLETION OF BRIEFING REGARDING
MOTIONS IN LIMINE**

PLEASE TAKE NOTICE that Plaintiffs PES Holdings, LLC, North Yard GP, LLC, North Yard Logistics, L.P., PES Administrative Services, LLC, PES Energy, Inc., PES Intermediate, LLC, PES Ultimate Holdings, LLC, and Philadelphia Energy Solutions Refining and Marketing LLC (collectively “PES”) and the Insurers, the defendants in this adversary

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: PES Holdings, LLC (8157); North Yard GP, LLC (5458); North Yard Logistics, L.P. (5952); PES Administrative Services, LLC (3022); PES Energy Inc. (0661); PES Intermediate, LLC (0074); PES Ultimate Holdings, LLC (6061); and Philadelphia Energy Solutions Refining and Marketing LLC (9574).

proceeding (collectively, the “Parties”), hereby provide notice that briefing has been completed with respect to the Parties’ motions in limine filed at Adv. Docket Nos. 230, 234, 239, and 259, (collectively, the “Motions”). Below is a list of all relevant pleadings and docket numbers filed and related to the Motions.

PLEASE TAKE FURTHER NOTICE THAT the Parties have conferred and agree that the exhibits to PES’s *Opposition to Defendant Insurers’ Omnibus Non-Expert Motion in Limine* [Adv. Docket No. 283], which exhibits are attached to the *Declaration of Chelsea L. Ireland in Opposition to Plaintiffs’ Opposition to Insurers’ Omnibus Non-Expert Motion in Limine* [Adv. Docket No. 284] are a representative sample of the reserve and reinsurance documents.²

² The Parties have agreed to forgo any replies relating to the Defendant Insurers’ Omnibus Non-Expert Motion in Limine [Adv. Docket No. 259].

Tab No.	Date Filed	Adv. Docket No.	Pleading
PLAINTIFFS' MOTION TO EXCLUDE THE EXPERT REPORT AND TESTIMONY OF JONATHAN HELD			
1.	11/12/21	<u>230</u>	Plaintiffs' Motion to Exclude the Expert Report and Testimony of Jonathan Held
2.	11/12/21	<u>231</u>	Memorandum of Law in Support of Plaintiffs' Motion to Exclude the Expert Report and Testimony of Jonathan Held
3.	11/12/21	<u>232</u>	Declaration of Nicholas R. Maxwell in Support of Plaintiffs' Motion to Exclude the Expert Report and Testimony of Jonathan Held
4.	12/10/21	<u>274</u>	Memorandum of Law In Opposition To Plaintiffs' Motion to Exclude The Report and Testimony of Jonathan Held
5.	12/20/21	<u>285</u>	Reply Memorandum of Law in Further Support of Plaintiffs' Motion to Exclude the Report and Testimony of Jonathon Held
DEFENDANT INSURERS' MOTION TO STRIKE PORTIONS OF THOMAS BRINDLEY'S REPORTS AND TO PRECLUDE HIS TESTIMONY ON CERTAIN TOPICS			
6.	11/12/21	<u>234</u>	Defendant Insurers' Motion to Strike Portions of Thomas Brindley's Reports and to Preclude His Testimony on Certain Topics
7.	12/6/21	<u>235</u>	Memorandum of Law in Support of Defendant Insurers' Motion to Strike Portions of Thomas Brindley's Reports and to Preclude His Testimony on Certain Topics
8.	12/10/21	<u>275</u>	Memorandum of Law in Opposition to Defendants' Motion to Strike Portions of Thomas Brindley's Reports and to Preclude His Testimony on Certain Topics
9.	12/10/21	<u>276</u>	Declaration of Nicholas R. Maxwell in Opposition to Defendant Insurers' Motion to Strike Portions of Thomas Brindley's Reports and to Preclude His Testimony on Certain Topics

10.	12/20/21	286	Reply Memorandum of Law in Support of Motion to Strike Portions of Thomas Brindley's Reports And To Preclude His Testimony on Certain Topics
DEFENDANT INSURERS' MOTION TO STRIKE EXPERT REPORT OF OLIE R. JOLSTAD AND REPLY BY OLIE R. JOLSTAD TO THE JULY 8, 2021 EXPERT REBUTTAL REPORT OF DALE S. FREDIANI, SR. AND TO THE JULY 8, 2021 EXPERT REPORT OF JONATHON C. HELD AND TO PRECLUDE HIS TESTIMONY			
11.	11/12/21	239	Defendant Insurers' Motion to Strike Expert Report of Olie R. Jolstad And Reply By Olie R. Jolstad To The July 8, 2021 Expert Rebuttal Report Of Dale S. Frediani, SR. And To The July 8, 2021 Expert Report of Jonathon C. Held And To Preclude His Testimony
12.	11/12/21	240	Memorandum of Law In Support of Motion to Strike Expert Report of Olie R. Jolstad and Reply by Olie R. Jolstad to the July 8, 2021 Expert Rebuttal Report of Dale S. Frediani, SR. and to the July 8, 2021 Expert Report of Jonathon C. Held and to Preclude His Testimony
13.	12/10/21	277	Memorandum of Law in Opposition to Defendant Insurers' Motion to Strike Expert Report of Olie R. Jolstad and Reply By Olie R. Jolstad to the July 8, 2021 Expert Rebuttal Report of Dale S. Frediani, Sr. and to the July 8, 2021 Expert Report of Jonathan C. Held and to Preclude His Testimony
14.	12/20/21	287	Reply Memorandum of Law in Support of Motion to Strike Expert Report of Olie R. Jolstad And Reply By Olie R. Jolstad To The July 8, 2021 Expert Rebuttal Report Of Dale S. Frediani, SR. And To The July 8, 2021 Expert Report of Jonathon C. Held And To Preclude His Testimony
DEFENDANT INSURERS' OMNIBUS NON-EXPERT MOTIONS IN LIMINE			
15.	12/3/21	259	Defendant Insurers' Omnibus Non-Expert Motion in Limine
16.	12/17/21	283	[Sealed] Plaintiff's Opposition to Defendant Insurers' Omnibus Non-Expert Motion in Limine
17.	12/17/21	284	[Sealed] Declaration of Chelsea L. Ireland in Opposition to Plaintiffs' Opposition to Insurers'

			Omnibus Non-Expert Motion in Limine
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Dated: December 29, 2021

/s/ Peter J. Keane

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